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**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China  
 company; CHINA INTERNATIONAL  
 COMMUNICATIONS CO., LTD., a China  
 company; TVB HOLDINGS (USA), INC., a  
 California corporation; and DISH  
 NETWORK L.L.C., a Colorado corporation,  
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
 LIMITED, a Hong Kong company; HUA  
 YANG INTERNATIONAL TECHNOLOGY  
 LIMITED, a Hong Kong company;  
 SHENZHEN GREATVISION NETWORK  
 TECHNOLOGY CO. LTD., a China  
 company; CLUB TVPAD, INC., a California  
 corporation; BENNETT WONG, an  
 individual, ASHA MEDIA GROUP INC.  
 d/b/a TVPAD.COM, a Florida corporation;  
 AMIT BHALLA, an individual;  
 NEWTPAD LTD. COMPANY d/b/a  
 NEWTPAD.COM a/k/a TVPAD USA, a  
 Texas corporation; LIANGZHONG ZHOU,  
 an individual; HONGHUI CHEN d/b/a E-  
 DIGITAL, an individual; JOHN DOE 1 d/b/a  
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
 JOHN DOE 5 d/b/a GANG YUE; JOHN  
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
 d/b/a GANG TAI WU XIA; and JOHN DOES  
 8-10,

Defendants.

Case No.  
**CV 15-1869 SVW (AJWx)**

**PLAINTIFFS' REQUEST FOR  
 MODIFICATION OF MAY 31,  
 2016 ORDER GRANTING  
 PLAINTIFFS' MOTION FOR  
 DEFAULT JUDGMENT AND  
 PERMANENT INJUNCTION  
 AGAINST DEFENDANTS  
 CREATE NEW TECHNOLOGY  
 (HK) LIMITED AND HUA  
 YANG INTERNATIONAL  
 TECHNOLOGY LTD. [DKT.  
 NO. 192]**

[{Proposed} Amended Order  
 Granting Plaintiff's Motion for  
 Default Judgment and Permanent  
 Injunction concurrently submitted]

Judge: Hon. Stephen V. Wilson

Complaint Filed: March 13, 2015

1 Plaintiffs China Central Television, China International Communications Co.,  
 2 Ltd., TVB Holdings (USA), Inc., and DISH Network L.L.C. (collectively  
 3 “Plaintiffs”) hereby respectfully request a modification of the Court’s May 31, 2016  
 4 Order Granting Plaintiffs’ Motion for Default Judgment and Permanent Injunction  
 5 Against Defendants Create New Technology (HK) Limited and Hua Yang  
 6 International Technology Ltd. [Dkt. No. 192] (hereafter the “May 31 Order”). The  
 7 May 31 Order recites an incorrect amount of damages awarded to Plaintiffs and  
 8 leaves blank the amount of the award of attorneys’ fees to Plaintiffs, as detailed  
 9 below:

- 10 • **First**, in paragraph 7 on page 4 of the May 31 Order, the Court states  
 11 that “Defendants are ordered to pay damages to Plaintiffs in the amount  
 12 of **\$326,360,691.**” (Emphasis added). However, in Judge Morrow’s  
 13 December 7, 2015 Amended Order granting Plaintiffs’ motion for  
 14 default judgment against Defendants Create New Technology (HK)  
 15 Limited (“CNT”) and Hua Yang International Technology Ltd.  
 16 (“HYIT”) [Dkt. No. 158], the Court awarded Plaintiffs only **\$55,460,691**  
 17 in copyright and trademark damages. Plaintiffs respectfully request that  
 18 the amount of the damages awarded in paragraph 7 on page 4 of the  
 19 May 31 Order be modified such that Defendants are ordered to pay  
 20 damages to Plaintiffs in the amount of \$55,460,691, rather than  
 21 \$326,360,691.
- 22 • **Second**, in paragraph 8 on page 4 of the May 31 Order, the Court left  
 23 blank the amount of the attorneys’ fees awarded to Defendants.  
 24 Plaintiffs have submitted all declarations and supporting evidence in  
 25 support of Plaintiffs’ request for attorneys’ fees in the amount of  
 26 **\$1,451,490** for the billed hours associated with CNT and HYIT’s  
 27 liability. Specifically, on April 4, 2016, the Court, in its Order granting  
 28 Plaintiffs’ request for a permanent injunction against CNT and HYIT,

1 directed Plaintiffs to file declarations in support of their request for  
 2 attorneys' fees no later than April 15, 2016. Dkt. No. 185. Plaintiffs, on  
 3 April 15, 2016, filed two declarations of Carla McCauley, and exhibits  
 4 thereto, in support of their request for \$1,451,490 of attorneys' fees, in  
 5 accordance with the Court's directive. Dkt. No. 187. These  
 6 declarations and exhibits had been previously submitted under Docket  
 7 Nos. 159 and 164. *See id.* Neither CNT nor HYIT has opposed the  
 8 requested amount of attorneys' fees. Accordingly, the Court has before  
 9 it all of Plaintiffs' support for the attorneys' fees it is requesting against  
 10 CNT and HYIT and Plaintiffs respectfully request that the Court enter  
 11 an award of attorneys' fees for Plaintiffs in the amount of \$1,451,490.

12 For these reasons, Plaintiffs respectfully request that the Court issue the  
 13 concurrently submitted Amended Order Granting Plaintiffs' Motion for Default  
 14 Judgment and Permanent Injunction Against Defendants Create New Technology  
 15 (HK) Limited and Hua Yang International Technology Ltd., which correctly recites  
 16 the amount of damages awarded to Plaintiffs and sets forth an award of attorneys'  
 17 fees for Plaintiffs in the amount of \$1,451,490.

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 19 DATED: August 10, 2016

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 23 By: /s/Carla A. McCauley  
 24 Carla A. McCauley

25 Attorneys for Plaintiffs  
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